CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA

WILLIAM L. KOVACS
SENIOR VICE PRESIDENT
ENVIRONMENT, TECHNOLOGY &
REGULATORY AFFAIRS

1615 H STREET, N.W. WASHINGTON, D.C. 20062 (202) 463-5457

March 2, 2012

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: In the Matter of Applications of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC and Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless, LLC for Consent to Assign Licenses, WT Docket No. 12-4

Dear Ms. Dortch:

The U.S. Chamber of Commerce, the world's largest business federation representing the interests of more than three million businesses and organizations of every size, sector, and region, is pleased to submit these reply comments to the Federal Communications Commission ("Commission") in the above-captioned proceeding. While the Chamber does not take a position on the merits of any particular transaction, we would like to reiterate our views about the importance of additional spectrum for mobile broadband.

Today our nation faces many significant challenges, but no priority is more important than job creation. The Chamber views broadband as a means to stimulate jobs and foster economic growth. Businesses, regardless of size or location, can use broadband technology to sell to customers around the country and the world. As evidenced by legislation—recently signed into law—authorizing incentive auctions for spectrum, Congress and the Administration recognize the importance of ensuring sufficient spectrum for mobile broadband.²

Jobs and new business opportunities are being created because mobile providers are investing tens of billions of dollars every year to upgrade their networks allowing for higher speeds and greater capacity, and, at the same time, innovative broadband-enabled applications, services, and devices are being developed. On December 25, 2011, alone, 242 million apps were

¹ Public Notice, Cellco Partnership D/B/A Verizon Wireless, SpectrumCo, LLC and Cox TMI Wireless, LCC Seek FCC Consent to the Assignment of AWS-1 Licenses, WT Docket No. 12-4, DA 12-67 (rel. Jan. 19, 2012).

² Middle Class Tax Relief and Job Creation Act, P.L. 112-96.

downloaded from iOS and Android platforms.³ U.S. mobile commerce sales in 2011 were an estimated \$6.7 billion—an increase of 91.4 percent over 2010—and are projected to reach \$31 billion by 2015.⁴ According to CTIA, mobile innovation supports 2.4 million U.S. jobs and contributes \$100 billion annually to U.S. GDP.⁵ The deployment of 4G wireless networks could generate up to \$53 billion in new capital investments, produce up to \$151 billion in gross domestic product growth, and create as many as 771,000 jobs, according to a recent report by Deloitte.⁶

Despite the sluggish economy, the wireless industry's annual capital investment grew by \$27.5 billion, or an increase of 28 percent, between June 2010 and June 2011. This continued high-level investment is needed because U.S. mobile data traffic is expected to increase 18-fold between 2011 and 2016. During the first half of 2011, U.S. consumers used 341.2 billion megabytes of wireless data, an increase of 111 percent over the same period in 2010. As consumers embrace tablets, smart appliances, and other wireless broadband-enabled devices, mobile network traffic will soar. The amount of traffic generated by mobile-connected tablets in 2016 will be almost as much as created by the entire global mobile network in 2012. As

To help our economy recover, the Chamber believes that mobile broadband will be a key component in the creation of jobs and innovation. Thank you for the opportunity to participate in this proceeding.

³ "App Store downloads reach record-breaking numbers this holiday season," Macworld, Dec. 28, 2011, available at http://www.macworld.com/article/164551/2011/12/app store downloads reach record breaking numbers this holiday season.html.

⁴ Press Release, *US M-Commerce Sales to Grow 91% to \$6.7 Billion in 2011*, eMarketer, Dec. 11, 2011, *available at* http://www.emarketer.com/PressRelease.aspx?R=1008716.

⁵ CTIA-The Wireless Association, GN Docket No. 09-51, WT Docket Nos. 08-165, 09-66, July 9, 2009.

⁶ The Impact of 4G Technology on Commercial Interactions, Economic Growth, and U.S. Competitiveness, Deloitte LLP, Aug. 2011, available at http://www.deloitte.com/assets/Dcom-unitedStates/Local%20Assets/Documents/TMT us tmt/us tmt impactof4g 081911.pdf.

⁷ Press Release, *CTIA-The Wireless Association Semi-Annual Survey Reveals Historical Wireless Trend* CTIA—The Wireless Association, Oct. 11, 2011, *available at* http://www.ctia.org/media/press/body.cfm/prid/2133. ("*CTIA Semi-Annual Survey Results*").

⁸ Press Release, *Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update*, 2011–2016., Cisco Systems, Inc., Feb. 14, 2012, *available at* http://www.cisco.com/en/US/solutions/collateral/ns341/ns525/ns537/ns705/ns827/white-paper-c11-520862.html. ("*Cisco Visual Networking Index Forecast*").

⁹ CTIA Semi-Annual Survey Results.

¹⁰ Cisco Visual Networking Index Forecast.

Ms. Marlene H. Dortch March 2, 2012 Page 3 of 3

Sincerely,

William L. Kovacs